

FILED

DEC 09 2025

CLERK, U.S. DISTRICT COURT
 EASTERN DISTRICT OF CALIFORNIA
 BY *[Signature]* DEPUTY CLERK

1 SHARON S. CHAND
 2 3074 Copper Rose Walk
 3 Sacramento, California 95833
 4 Email: Sharon.S.Chand@gmail.com
 5 Voicemail: 408.931.3574

4 IN THE UNITED STATES DISTRICT COURT
 5 FOR THE EASTERN DISTRICT OF CALIFORNIA

6 SHARON S. CHAND,

7 Plaintiff,

8 vs.

9 LORI LYNN RICH-BANALES, an
 10 individual; PHILIP J. BONNET, an
 11 individual; JENNIFER LYNN CRICK, an
 12 individual; ALTA CALIFORNIA
 13 REGIONAL CENTER; an organization,

14 Defendants.

Case No. 2:23-cv-01583-DC-SCR (PS)

MOTION FOR DEFAULT JUDGEMENT

Complaint Filed: August 1, 2023
 FAC Filed: October 5, 2023
 SAC Filed: November 3, 2025
 Trial Date: Not Assigned

15 The Plaintiff, Pro Se, respectfully submits her Motion for Default Judgment in
 16 response to the Defendant's Notice of Motion for Extension of Time to File Responsive
 17 Pleading. The Defendants missed their November 24, 2025, responsive pleading deadline.
 18 The Defendants moved to file their motion on 12/03/2025 for an extension, after an earlier,
 19 unsuccessful attempt, to deceive the Plaintiff into granting them an extension of (15) days.

20 The Plaintiff provides a timeline of events that occurred between 12/02/2025
 21 through 12/07/2025 (with email exchanges between both parties), to show the Court the
 22 Counsel's bad faith efforts to deceive the Plaintiff, and hide the true cause of the missed
 23 deadline to file their answer to Plaintiff's Second Amended Complaint (SAC).

1 MR. MARSENOVIC AND MS. DUFFY'S CALL AND EMAIL TO PLAINTIFF

2 On December 2, 2025, Mr. Mark Marsenovic called and left a voicemail for Plaintiff
3 at her cell phone number at 11:22AM, requesting a call back. The plaintiff listened to the
4 voicemail and promptly called Mr. Marsenovic. Mr. Marsenovic informed Plaintiff he needed
5 to "fix deficiencies" with Plaintiff's complaint because it was "not in-line with the Judge's
6 order". Mr Marsenovic proceeded to tell Plaintiff he needed to "fix deficiencies" with the
7 Plaintiff's filing with the court and if she (Plaintiff) would be agreeable to a (15) day
extension.

8 The plaintiff was perplexed by Mr. Marsenovic's request. Prior to the call, Plaintiff
9 had no communication with Mr. Marsenovic. Plaintiff asked what exactly were the
10 "deficiencies" with her filing with the court and why would he not reach out directly to the
11 Judge. Mr. Marsenovic told Plaintiff in an effort to save time and money, he was reaching out
12 to her. Plaintiff informed Mr. Marsenovic she is without counsel and representing herself and
was not sure what exactly he was asking.

13 Mr. Marsenovic told Plaintiff to look up California Rules of Court 3.110 and give him
14 a decision. The plaintiff was working at the time and ended the call with Mr. Marsenovic. At
15 3:41PM, Mr. Marsenovic sent an email to Plaintiff's email account, and copied attorney
16 Maureen Duffy. The plaintiff was not aware of Ms. Duffy (or Mr. Marsenovic) prior to the
17 call on 12/02/2025. Mr. Marsenovic informed Plaintiff in his email, "We have
18 double-checked the file, and PACER, and it appears that the Second Amended Complaint has
not yet been served onto Defendants". Mr. Marsenovic also informed Plaintiff a proof of
19 service was not filed through PACER either. (Exhibit A).

20 Mr. Marsenovic's email to Plaintiff was simply not true. Plaintiff had timely filed her
SAC on 11/03/2025 with the Clerk of the Court. Plaintiff has made a request to the Court for
Page 2

1 medical reasons to file electronically via PACER and this request was denied. Plaintiff had
2 surgery on her right foot (driving) to remove broken bone and repair a complete achilles
3 tendon rupture. To ensure she met the deadline of 11/03/2025, Plaintiff had made
4 arrangements for a ride so she herself could personally file the SAC. Plaintiff received an
5 email confirmation from On Demand Legal (ODL) services that served the SAC to
6 designated counsel, Ms. Kaitlyn L. Lavaroni and Ms. Jillian P. Vallejo. (Exhibit ).

7 On 09/29/2025, Plaintiff received an email from JACKSON LEWIS P.C., with Notice
8 of Designation of Counsel for Defendants. Previous counsel, Gaurav Bobby Kalra was no
9 longer counsel of record and was removed from the lawsuit. Ms. Kaithlyn L. Lavaroni and
10 Ms. Jillian P. Vallejo, were designated as new counsel for all (4) defendants in the lawsuit.
11

12 Ms. Lavaroni was identified as the “Lead” counsel for Plaintiff’s complaint against all
13 (4) defendants, with Ms. Vallejo serving as “Associate” counsel. The Notice of Designation
14 stated “All pleadings, correspondence, and other case-related information in the future should
15 be served on Ms. Lavaroni and Ms. Vallejo as follows.” Plaintiff’s SAC was served by On
16 Demand Legal to both Ms. Lavaroni and Ms. Vallejo on 11/3/2025. (Exhibit )

17 Plaintiff sent a follow-up email to Mr. Marsenovic, and copied Ms. Duffy, “Are you
18 not the attorneys for the defendants? Should the amended complaint not have been served to
19 you?” (Exhibit B). Plaintiff did not receive a reply from Mr. Marsenovic or Ms. Duffy.
20 Plaintiff again attempted to reach Mr. Marsenovic and Ms. Duffy, “Can you please confirm if
the complaint needs to be served to all the defendants listed in the complaint?” Plaintiff did
not receive a reply to her second attempt to get clarification about the SAC. (Exhibit ).

21 Plaintiff immediately reached out to On Demand Legal and inquired about the missing
22 proof of service. Plaintiff was informed there was an extra fee for the business to file the
23 document with the court (after the SAC was served on 11/03/2025); this was a simple
24

1 oversight. Plaintiff promptly paid the fees and the Proof of Service was filed on 12/02/2025.

2

3 **COUNSEL'S FILING WITH THE COURT ON 12/03/2025**

4 On 12/03/2025, at 9:44AM, Ms. Duffy and Mr. Marsenovic sent an email with an
5 attachment to Plaintiff. The email informed Plaintiff they were the new designated counsel for
6 all (4) defendants; Ms. Lavaroni was “no longer counsel of record” and was removed as
7 counsel in the lawsuit. Plaintiff replied to Ms. Duffy at 9:51AM, “This complaint was already
8 served 30 days ago. Today is the deadline for your answer to the amended complaint. Am I
9 required to serve you as a new council even though its the same law firm? Please let me know
10 as soon as possible.” Plaintiff was under the impression Counsel had the same (30) days to
11 reply to her complaint, like she was provided by the Court. Worried about missing any new
12 deadlines with the court, the Plaintiff directly called Ms. Duffy’s office. (Exhibit 1).

13 Ms. Duffy informed Plaintiff the case was transferred to her office in San Jose because
14 the defendants were looking to resolve the matter quickly. Ms. Duffy stated she was known to
15 bring a resolution quickly to the satisfaction of both parties. The Plaintiff informed Ms.
16 Duffy, due to recent health concerns, she was receptive to hearing Ms. Duffy. Ms. Duffy
17 insisted she and Plaintiff met right away to discuss “next steps”, stating she was also available
18 evenings, including weekends. Plaintiff suggested a month out to buy herself time to first
19 speak with the Judge about “deficiencies” with her filing. Ms. Duffy aggressively pursued a
20 date to schedule while on the phone, and Plaintiff agreed on Saturday, 12/13/2025, to get off
the phone. Ms. Duffy stated she will file their responses with the courts while on the phone.

21 Ms. Duffy followed-up with an email to the Plaintiff with a recap email of their
22 conversation (Exhibit 2). Ms. Duffy then followed-up with a calendar invite for 12/13/2025
23 (Exhibit 3). At 11:51AM, the Plaintiff received another email from Counsel, this time with
Page 4

1 attachments of their filings with the court. Plaintiff read through the Defendants' Motion for
2 Extension of Time to File Responsive Pleading, requesting for an (30) day extension, Mr.
3 Marsenovic's Declaration, and Proposed Order Granting the Defendant's request for an
4 extension. (Exhibit E)

5 Plaintiff discovered after reading the attachments that Counsel has missed their
6 11/24/2025 responsive pleading deadline. Ms. Lavaroni, still the designated lead counsel for
7 defendants on 12/02/2025, did not reach out to Plaintiff in a good faith effort to discuss the
8 missed deadline and ask for an extension. It appears once Ms. Lavaroni became aware about
9 the 11/24/2025 a week later, a scheme was put into action to trick the Plaintiff into agreeing to
10 a (15) day extension. It became evident to Mr. Marsenovic during his call with Plaintiff that
11 she was completely unaware of the missed deadline. (Exhibit A)

12 A review of Plaintiff's file would have informed Ms. Lavaroni, Mr. Marsenovic and
13 Ms. Duffy that Plaintiff was Pro Se, her request to file electronically was denied by the court,
14 and she had not entered a Default Judgement after 11/24/2025. After Counsel's call and email
15 on 12/02/2025, Counsel immediately filed with court on morning of 12/03/2025, removing
16 Ms. Lavoroni as Lead Counsel. Ms. Duffy and Mr. Marsenovic were designated as counsel
17 for all (4) defendants. This filing effectively stop Plaintiff's ability to seek a Default
18 Judgment. The plaintiff was still not aware about her right to a default judgment. Counsel
19 submitted a Motion for an extension to file their answer to Plaintiff's SAC.

20 Plaintiff spent all night on 12/03/2025 to draft and file her own Pleading after a
heated email exchange with Ms. Duffy. (Exhibit E). Ms. Duffy (located 100 miles away in
San Jose) refused service of the Plaintiff's Pleading and did not allow the process server to
enter the building. The process server left the Pleading with the building's security, who, it
appears at the direction of Ms. Duffy, refused to provide his name. (Exhibit F).

1 PLAINTIFF'S ANSWER TO COUNSEL'S MOTION

2 First, the method of “hand-served” did not prevent Counsel from missing the
3 11/24/2025 deadline. Plaintiff’s SAC was filed and served to the designated lead counsel, Ms.
4 Lavaroni, on 11/03/2025. Ms. Lavaroni was in receipt of, and/or had access to Plaintiff’s SAC
5 in PACER. Plaintiff can confirm the SAC was docketed #33 in PACER. SAC was filed on
6 11/03/2024 and entered on 11/04/2025. It was available to Counsel since 11/04/2025.
7 Plaintiff’s method of “hand-served” was not the cause of Counsel missing their 11/24/2025
8 deadline. The SAC was served and accepted by staff Arisa Oshira, “Authorized to Accept”, as
9 shown in Exhibit A, provided with Mr. Marsenovic’s Declaration.

10 Second, Plaintiff immediately located and had On Demand Legal (process server) file
11 the missing proof of service, on 12/02/2025, following the call with Mr. Marsenovic. It was
12 docketed #34, in PACER. Counsel submitted their Designation of Counsel for Defendants and
13 Motion for Extension of Time to File Answer, collectively on 12/03/2025, docketed at #35
14 and #36, respectively. Plaintiff’s SAC and proof of service were already entered and available
15 in PACER. Mr. Marsenovic included Plaintiff’s proof of service (DOC #34) as Exhibit A but
16 ignored the Plaintiff’s SAC (DOC #33).

17 Third, it appears this oversight was intentional by Counsel. It raises serious concerns
18 with both Mr. Marsenovic’s Declaration, and Ms. Duffy’s Motion, filed with the Court on
19 12/03/2025. Mr. Marsenovic states in his Declaration, “I am fully familiar with the case file
20 and its contents, including the pleadings. I am also familiar with the correspondence and
litigation activity in this case,”, including, “Ms. Duffy and I were unaware of the hand-served
SAC until December 2, 2025.” Related, Ms. Duffy’s Motion states, under Statement of Facts,
“Ms. Duffy and Mr. Marsenovic were unaware of the hand-served SAC until December 2,
2025. Notably, Plaintiff did not file her proof of service until December 2, 2025.”

1 Counsel referenced Plaintiff's proof of service and downloaded it to include as Exhibit
2 A in Mr. Marsenovic's Declaration. This is confirmation they were privy to, and also had
3 access to the SAC in PACER, filed right before the proof of service. Plaintiff's method of
4 delivery (hand-served) and lack of a timely filed proof of service were not the cause of
Counsel missing their deadline by more than a week.

5 Fourth, the Plaintiff had a major surgery earlier this year on 01/31/2025. The Plaintiff
6 had a fall that resulted in broken bone and a complete achilles tendon rupture. The Plaintiff
7 was bed bound post-surgery for months, followed by months of physical therapy learning to
8 walk and safely use the stairs. She is left with a surgical scar that goes from the bottom of her
9 foot to her calf. The Plaintiff requested to file electronically via PACER due to her surgery
10 and the court denied this request. Despite her surgery, followed by months of disability, the
11 Plaintiff did her due diligence and made arrangements for a ride to the court, walked up those
12 stairs, stood in line and filed her complaint to meet the Court's deadline of 11/03/2025.

12 Fifth, Ms. Duffy's argument "counsel has acted in good faith" is manipulative, false,
13 and a scheme. The Plaintiff was not granted access to file electronically via PACER, but
14 Counsel had both access (and convenience) of filing on time to meet the deadline of
15 11/24/2025. Ms. Lavaronic, a "Principal" at JACKSON LEWIS P.C. (Sacramento), and
16 designated lead counsel for defendants, showed a complete indifference to the deadline she
17 missed by more than a week. Ms. Lavaroni, still the lead counsel on 12/02/205, did not make
18 the call herself to speak with Plaintiff; it was Mr. Marsenovic, an Associate, in the same
 office. After an unsuccessful attempt to get the Plaintiff to agree to a (15) day extension,
 Counsel proceeded with another scheme.

Once Counsel became aware Plaintiff did not know about their missed deadline,
20 mistakenly thought the deadline for Defendants was 12/03/2025, and never mentioned a

1 Default Judgment, immediate action was taken to remove Ms. Lavaroni as lead counsel,
2 replaced by Ms. Duffy (new lead counsel), and Mr. Marsenovic. Counsel then filed an instead
3 motion for extension to file, and presented their argument of “excusable neglect” to the Court.
4 Counsel shifted the blame onto Plaintiff’s method of delivery, a.k.a “hand-served SAC”; they
5 falsely argued the “the matter moving through multiple hands” as a reason for the missed
6 deadline, but left out a glaring fact that Ms. Lavaroni, the lead designated counsel, missed
7 the deadline, and was removed right before the motion was filed on the same day.

8 Sixth, Counsel’s conduct towards Plaintiff is highly unethical. Plaintiff’s prejudice
9 goes far beyond “just a 30-day delay”. The audacity for Counsel to make such a statement
10 when they were fully aware of the scheme they had put into action against the Plaintiff is
11 shameful for JACKSON LEWIS P.C.; it is despicable and inexcusable conduct by Counsel.

12 This incident is an example of the trauma Plaintiff experienced with the Defendant’s
13 previous counsel, Mr. Bruce Sarchet, from Litter Mendelson. The Plaintiff was kept in a
14 room, not allowed to leave and coerced into signing a severance agreement, giving up all her
15 rights because of Ms. Phyllis Cheng, Mr. Sarchet’s former colleague, and former Director of
16 California’s Civil Rights Department. This has become a core memory for the Plaintiff
17 because of the trauma she suffered, and she also witnessed how Defendants used money and
18 influence, to silence her ability to speak about her experience, and those of others.

19 When Plaintiff found out Counsel had attempted to deceive her about their missed
20 deadline to get an extension, the memories from what happened six years ago came back.
What followed was a heated email exchange with Ms Duffy on 12/03/2025. Ms. Duffy and
Mr. Marsenovic’s actions were in-line with the deception and manipulation the Plaintiff
experienced at the hands of the Defendant’s previous counsel. Plaintiff incurred hundreds of
dollars in cost, paid with her credit card, to stop the Counsel’s scheme. Plaintiff will be

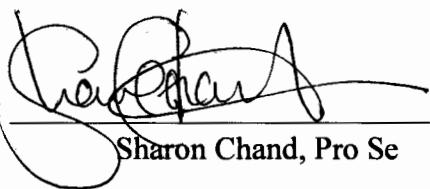
1 outmatched by Counsel's resources, money, time and legal training; she will be no-match to
2 their trickery, tactics, gamemanship, and schemes.

3 The Court should NOT reward such gross misconduct and egregiously unethical
4 behavior. The Notification of Designation of Counsel for Defendants, Ms. Duffy's Motion,
5 and Mr. Marsenovic Declaration, were filed strategically with the court to hide the fact that
6 Ms. Lavaroni was the lead counsel from 09/29/20 until 12/03/2025; she was served the SAC
7 properly and on time; the proof of service confirmed the SAC was accepted; and she had
access to the SAC on PACER. Ms. Lavaroni had no reason to miss the 11/24/2025 deadline.

8 Ms. Lavaroni had simply failed to do her due diligence as the lead counsel; she missed
9 the 11/24/2025 deadline by more than a week. Counsel should be held to their original
10 deadline of 11/24/2025, and a Default Judgement should be granted for Plaintiff. As a Pro Se
11 litigant, Plaintiff has met a higher bar of due diligence than Ms. Lavaroni; she did not miss
12 her deadline, despite her (very real) barriers. Ms. Lavaroni's own lack of due diligence was
13 the true cause of Counsel missing the 11/24/2025 deadline. It was not caused by Plaintiff's
14 method of delivery, late filing of the proof of service, or previous counsel.

15 Plaintiff is requesting a default judgment to be entered against the Defendant. The
16 plaintiff is also requesting sanctions against Ms. Lavaroni, Ms. Duffy and Mr. Marsenovic.

17 Dated: 12/09/2025

18 By: 
19 Sharon Chand, Pro Se

20

Exhibit A



Sharon Chand <sharon.s.chand@gmail.com>

Chand v. Alta California Regional Center, et al.

3 messages

Marsenovic, Mark (Sacramento) <Mark.Marsenovic@jacksonlewis.com>

Tue, Dec 2 at 1:55 PM

To: Sharon.S.Chand@gmail.com <Sharon.S.Chand@gmail.com>

Cc: Duffy, Maureen M. (Silicon Valley) <Maureen.Duffy@jacksonlewis.com>

Hi Sharon,

Thank you for taking the time to speak with me today regarding the *Chand v. Alta California Regional Center, et al.* matter. We have double-checked the file, and PACER, and it appears that the Second Amended Complaint has not yet been served onto Defendants. If our understanding is incorrect, please provide a copy of the proof of service. Please also note that it appears that you have not filed a proof of service through PACER either.

Best,

Mark

 **Mark Marsenovic**

Attorney at Law

Jackson Lewis P.C.

400 Capitol Mall.

Suite 1600

Sacramento, CA 95814

Direct: (916) 288-3021 | Main: (916) 341-0404

Mark.Marsenovic@jacksonlewis.com | www.jacksonlewis.com

Sharon Chand <sharon.s.chand@gmail.com>

Tue, Dec 2 at 2:58 PM

To: Marsenovic, Mark (Sacramento) <Mark.Marsenovic@jacksonlewis.com>

Cc: <Maureen.Duffy@jacksonlewis.com>

Hello, Mark.

I used a process server.

I'm confused by your question. Are you not the attorneys for the defendants? Should

the amended complaint not have been served to you?

I'm looking into why the proof of service is not with the court.

Also, I looked into the legal code (3.110) you gave me. It's for California but my case is filed in federal court.

I'm confused by what you told me on the phone. You said you needed time to "fix deficiencies" with MY complaint because it was not in line with the judges order? Are you referring to the proof of service you could not find with the court?

As you're aware, I don't have council. I'm not quite understanding what I need to do here? Are you making me aware there is not a proof of service with the court or the defendants were not served in a timely manner?

I will reach out to the Judge because I had paid for the server to have the complaint served to your office. I was not aware the defendants had to be served individually again. If there are any deficiencies with my filing, I will be more than happy to get it corrected and let the Judge know.

Thank you for bringing this to my attention.

Thanks, Sharon

[Quoted text hidden]

Sharon Chand <sharon.s.chand@gmail.com>
To: Marsenovic, Mark (Sacramento) <Mark.Marsenovic@jacksonlewis.com>
Cc: <Maureen.Duffy@jacksonlewis.com>

Tue, Dec 2 at 3:41PM

Hello, Mark.

Can you please confirm if the complaint needs to be served to all the defendants listed in the complaint?

I will make arrangements right away and let the Judge know the complaint was served to your office only, in error.

Please let me know if this is the deficiencies with my filing and I will take care of it right away.

I will let the Judge know about my error and misunderstanding of the process.

Thank you, Sharon.

[Quoted text hidden]

Exhibit B



Sharon Chand <sharon.s.chand@gmail.com>

Delivery Notification for ODL Order No.: 280139.00 | Client ref.:Chand v Lori Lynn rich-Bannales, an individual, et Chand v Lori Lynn rich-Bannales, an individual, et
1 message

Contact Us <contactus@odlegal.net>
Reply-To: contactus@odlegal.net
To: contactus@odlegal.net, Sharon.s.chand@gmail.com

Mon, Nov 3, 2025 at 11:41 AM

Order 280139.00 was delivered at 11/03/25 11:40 AM.
Served/Delivered to: Arisa Oshiro -administrative Assistant
Base Rate 105.00
C.C. Convenience Fee 5.51
Fuel Surcharge 5.25

3 Miles

Reference1: Chand v Lori Lynn rich-Bannales, an individual, et
Reference2: Chand v Lori Lynn rich-Bannales, an individual, et
Local Process SPECIAL (1 to 24 Hours)
Document List: Second Amended Complaint
Instructions: JACKSON LEWIS- SPECIAL-DO TODAY! | CCP Â§1011a - Serve Attorney Direct or Serve Receptionist or Leave at Reception between 9am and 5pm. | Please have the documents in an envelope and addressed to the attorney(s) and address for service.

Order placed by: Sharon Chand 408-931-3574

Origin

Odl
2525 Natomas Park DrSte 330
Sacramento CA 95833

Destination

Kaitlyn L. Lavaroni, Jillian P. Vallejo
400 Capitol MallSuite 1600
Sacramento CA 95814

Service Instruction: JACKSON LEWIS- SPECIAL-DO TODAY! | CCP Â§1011a - Serve Attorney Direct or Serve Receptionist or Leave at Reception between 9am and 5pm. | Please have the documents in an envelope and addressed to the attorney(s) and address for service.

Details

Pieces: Weight: Ready for pickup: 11/03/25 10:28 AM
Due: 11/03/25 12:28 PM

Exhibit C



Sharon S. Chand <sharon.s.chand@gmail.com>

Sharon S. Chand v. Rich-Banales, et al.

1 message

Bickford, Kristina (Sacramento) <Kristina.Bickford@jacksonlewis.com>
To: "Sharon.S.Chand@gmail.com" <Sharon.S.Chand@gmail.com>
Cc: "Lavaroni, Kaitlyn L. (Sacramento)" <Kaitlyn.Lavaroni@jacksonlewis.com>, "Vallejo, Jillian (Sacramento)" <Jillian.Vallejo@jacksonlewis.com>

Mon, Sep 29, 2025 at 11:48 AM

Good morning. Attached please find a courtesy copy of:

- **NOTICE OF DESIGNATION OF COUNSEL FOR DEFENDANTS**

A copy of the same has been mailed to you. Thank you.



Kristina Bickford
Legal Secretary

Jackson Lewis P.C.
400 Capitol Mall.
Suite 1600
Sacramento, CA 95814
Direct: (916) 403-8657 | Main: (916) 341-0404
Kristina.Bickford@jacksonlewis.com | www.jacksonlewis.com

 2025.09.29 Notice of Designation of Counsel for Defendants [Alta Regional - Chand].pdf
46K

1 JACKSON LEWIS P.C.
2 KAITLYN L. LAVARONI (SBN 313366)
3 JILLIAN P. VALLEJO (SBN 359011)
4 400 Capitol Mall, Suite 1600
5 Sacramento, California 95814
Telephone: (916) 341-0404
Facsimile: (916) 341-0141
Email: Kaitlyn.Lavaroni@jacksonlewis.com
Jillian.Vallejo@jacksonlewis.com

6 Attorneys for Defendants
7 Lori Lynn Rich-Banales,
Philip J. Bonnet, Jennifer Lynn Crick,
8 Alta California Regional Center

9
10 UNITED STATES DISTRICT COURT
11
12 EASTERN DISTRICT OF CALIFORNIA

13 SHARON S. CHAND,
14 Plaintiff,

CASE NO. 2:23-cv-01583-DC-SCR

**NOTICE OF DESIGNATION OF
COUNSEL FOR DEFENDANTS**

15 v.
16 Lori Lynn Rich-Banales, an individual;
Philip J. Bonnet, an individual;
17 Jennifer Lynn Crick, an individual;
Alta California Regional Center,
an organization,

18 Defendants.

19 Second Amended Complaint Filed: 10.25.2023
20 Trial Date: Not Yet Set

21
22 **TO THE HONORABLE COURT, AND TO PLAINTIFF SHARON S. CHAND
23 AND HER ATTORNEYS OF RECORD:**

24 NOTICE IS HEREBY GIVEN that, effective immediately, Gaurav Bobby Kalra
25 (State Bar No. 219483) is no longer counsel of record, and therefore should be removed from this
26 action as counsel for Defendants Lori Lynn Rich-Banales, Philip J. Bonnet,
27 Jennifer Lynn Crick, and Alta California Regional Center ("Defendants").

28 ///

1 NOTICE IS FURTHER GIVEN that Kaitlyn L. Lavaroni (State Bar No. 313366) and
2 Jillian P. Vallejo (SBN 359011) of Jackson Lewis P.C. are designated as counsel for Defendants
3 LORI LYNN RICH-BANALES, PHILIP J. BONNET, JENNIFER LYNN CRICK, and
4 ALTA CALIFORNIA REGIONAL CENTER for all purposes in this action.

5 All pleadings, correspondence, and other case-related information in the future should be
6 served on Ms. Lavaroni and Ms. Vallejo as follows:

7 **New Handling Attorney and Lead Counsel of Record:**

8 Kaitlyn L. Lavaroni (State Bar No. 313366) (Lead)

9 Kaitlyn.Lavaroni@jacksonlewis.com

10 JACKSON LEWIS P.C.

400 Capitol Mall, Suite 1600

11 Sacramento, California 95814

12 Telephone: (916) 341-0404

13 **Associate Counsel:**

14 Jillian P. Vallejo (SBN 359011)

15 Jillian.Vallejo@jacksonlewis.com

16 JACKSON LEWIS P.C.

400 Capitol Mall, Suite 1600

17 Sacramento, California 95814

18 Telephone: (916) 341-0404

19 Dated: September 29, 2025

20 JACKSON LEWIS P.C.

21 By: /s/ Kaitlyn L. Lavaroni

22 Kaitlyn L. Lavaroni

23 Jillian P. Vallejo

24 Attorneys for Defendants

25 LORI LYNN RICH-BANALES,

26 PHILIP J. BONNET, JENNIFER LYNN

27 CRICK, ALTA CALIFORNIA REGIONAL

28 CENTER

PROOF OF SERVICE

I am employed in the County of Sacramento, State of California. I am over the age of 18 and not a party to the within action; my business address is 400 Capitol Mall, Suite 1600, Sacramento, California 95814.

On September 29, 2025, I served the foregoing document described as:

NOTICE OF DESIGNATION OF COUNSEL FOR DEFENDANTS

in this action by transmitting a true copy thereof addressed as follows:

Sharon S. Chand
3074 Copper Rose Walk
Sacramento, CA 95833
Telephone: (408) 931-3574
Email: Sharon.S.Chand@gmail.com

PRO SE

BY MAIL – By causing a true and correct copy thereof enclosed in a seal envelope with postage thereon fully prepaid for deposit in the United State Post Office mailbox, at my business address shown above, following Jackson Lewis P.C.’s ordinary business practices for collection and processing of mail, of which I am readily familiar, and addressed as set forth above. On the same day correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United State Postal Service. [(X) *Courtesy copy by e-mail/fax.*]

E-MAIL OR ELECTRONIC TRANSMISSION - Based on California Code of Civil Procedure Section 1010.6(b)(2) and/or California Rules of Court, rule 2.241(c)(3), I caused the document(s) described above to be sent from e-mail address kristina.bickford@jacksonlewis.com to the person(s) at the e-mail address(es) listed above.

BY OVERNIGHT DELIVERY: I caused such envelope(s) to be delivered to the above address within 24 hours by overnight delivery service.

STATE - I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on September 29, 2025, at Sacramento, California.

/s/ Kristina Bickford

Kristina Bickford

Exhibit D



Sharon Chand <sharon.s.chand@gmail.com>

RE: Sharon S. Chand v. Lori Lynn Rich-Banales, et al.; Case No. 2:23-cv-01583-DC-SCR - Scheduled call on December 13th at 10:00 am

2 messages

Duffy, Maureen M. (Silicon Valley) <Maureen.Duffy@jacksonlewis.com>

Wed, Dec 3, 2025 at 10:10 AM

To: Sharon Chand <sharon.s.chand@gmail.com>, "Torres, Valynn (Silicon Valley)" <Valynn.Torres@jacksonlewis.com>

Cc: "Marsenovic, Mark (Sacramento)" <Mark.Marsenovic@jacksonlewis.com>

Hi Sharon,

Thank you for your email, and your phone call just now. As discussed, we are filing our response at this moment.

Also as discussed, we are scheduled to discuss possible resolution of this matter on Saturday, December 13th at 10:00 am. I will send you an invitation under separate email.

As we also discussed, if you have any questions between now and our meeting, please reach out to me via email or phone, as noted in my signature block below.

Best regards,



Maureen M. Duffy (She/Her)

Attorney at Law

Jackson Lewis P.C.

160 W Santa Clara St.

Suite 400

San Jose, CA 95113

Direct: (408) 513-2275 | Main: (408) 579-0404

Maureen.Duffy@jacksonlewis.com | www.jacksonlewis.com

From: Sharon Chand <sharon.s.chand@gmail.com>

Sent: Wednesday, December 3, 2025 9:51 AM

To: Torres, Valynn (Silicon Valley) <Valynn.Torres@jacksonlewis.com>

Cc: Duffy, Maureen M. (Silicon Valley) <Maureen.Duffy@jacksonlewis.com>; Marsenovic, Mark (Sacramento) <Mark.Marsenovic@jacksonlewis.com>

Subject: Re: Sharon S. Chand v. Lori Lynn Rich-Banales, et al.; Case No. 2:23-cv-01583-DC-SCR - Notice of Designation of Counsel

Hello, Maureen.

This complaint was already served 30 days ago. Today is the deadline for your answer to the amended complaint.

Am I required to serve you as a new council even though it's the same law firm?

Please let me know as soon as possible.

Thank you,

Sharon

On Wed, Dec 3, 2025 at 9:44 AM Torres, Valynn (Silicon Valley) <Valynn.Torres@jacksonlewis.com> wrote:

Dear Ms. Chand:

As a courtesy, attached please find the Notice of Designation of Counsel for Defendants for your review and records. The original will follow via U.S. mail. Thank you.

Regards,



Valynn R. Torres (She/Her)

Legal Secretary

Jackson Lewis P.C.

160 W Santa Clara St.
Suite 400

San Jose, CA 95113

Direct: (408) 513-2264 | Main: (408) 579-0404

Valynn.Torres@jacksonlewis.com | www.jacksonlewis.com

Sharon Chand <sharon.s.chand@gmail.com>

To: "Duffy, Maureen M. (Silicon Valley)" <Maureen.Duffy@jacksonlewis.com>

Cc: "Torres, Valynn (Silicon Valley)" <Valynn.Torres@jacksonlewis.com>, "Marsenovic, Mark (Sacramento)"

<Mark.Marsenovic@jacksonlewis.com>

Wed, Dec 3, 2025 at 11:13 AM

I'm in receipt of the recap email below. Thank you.

[Quoted text hidden]



Sharon Chand <sharon.s.chand@gmail.com>

Call with Sharon Chand regarding possible resolution of matter

1 message

Duffy, Maureen M. (Silicon Valley) <Maureen.Duffy@jacksonlewis.com>
To: Sharon Chand <sharon.s.chand@gmail.com>
Cc: "Marsenovic, Mark (Sacramento)" <Mark.Marsenovic@jacksonlewis.com>

Wed, Dec 3, 2025 at 10:12 AM

Microsoft Teams Need help?

Join the meeting now

Meeting ID: 269 046 247 395 1

Passcode: 39kC9js9

Dial in by phone

+1 716-304-0311,,914369382# United States, Niagara Falls

Find a local number

Phone conference ID: 914 369 382#

Join on a video conferencing device

Tenant key: teams@meet.jacksonlewis.com

Video ID: 114 161 054 2

More info

For organizers: Meeting options | Reset dial-in PIN

JacksonLewis

[invite.ics](#)
5K

Exhibit E



Sharon Chand <sharon.s.chand@gmail.com>

Sharon S. Chand v. Lori Lynn Rich-Bannales, et al.; Case No. 2:23-cv-01583-DC-SCR (PS) - Motion for Extension of Time

4 messages

Torres, Valynn (Silicon Valley) <Valynn.Torres@jacksonlewis.com>
To: Sharon Chand <sharon.s.chand@gmail.com>
Cc: "Duffy, Maureen M. (Silicon Valley)" <Maureen.Duffy@jacksonlewis.com>, "Marsenovic, Mark (Sacramento)" <Mark.Marsenovic@jacksonlewis.com>

Wed, Dec 3, 2025 at 11:51 AM

Dear Ms. Chand:

As a courtesy, attached please find the following:

1. DEFENDANTS' NOTICE OF MOTION AND MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADINGS; MEMORANDUM OF POINTS AND AUTHORITIES;
2. DECLARATION OF MARK MARSENOCVIC IN SUPPORT OF DEFENDANTS' MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADINGS;
3. [PROPOSED] ORDER GRANTING DEFENDANTS' MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING.

For your review and records. The original will follow via U.S. mail. Thank you.

Regards,



Valynn R. Torres (She/Her)
Legal Secretary

Jackson Lewis P.C.
160 W Santa Clara St.
Suite 400
San Jose, CA 95113
Direct: (408) 513-2264 | Main: (408) 579-0404
Valynn.Torres@jacksonlewis.com | www.jacksonlewis.com

3 attachments

- 2025.12.3 - Defendant's Notice of Motion and Motion to for Extension of Time (Chand v. Alta).pdf**
23K
- 2025.12.3 - Proposed Order re Motion for Extension of Time (Chand v. Alta).pdf**
40K
- 2025.12.3 - Dec of Mark Marsenovic ISO Motion For Extension of Time (Chand v. Alta).pdf**
82K

Sharon Chand <sharon.s.chand@gmail.com>

Wed, Dec 3, 2025 at 2:40 PM

To: "Torres, Valynn (Silicon Valley)" <Valynn.Torres@jacksonlewis.com>

Cc: "Duffy, Maureen M. (Silicon Valley)" <Maureen.Duffy@jacksonlewis.com>, "Marsenovic, Mark (Sacramento)"

<Mark.Marsenovic@jacksonlewis.com>

Thank you for the update.

But what you have filed with the courts is not what happened. I received a call from Mark yesterday around 11. We had never spoken before.

He told me he was contacting me because there were deficiencies with my filing that he needed to fix. I found the phone call to be odd at best. He told me my filings were not in line with the judges order. He told me he needed 15 days to get it fixed.

This is quite misleading, Maureen. It appears you were not honest with me. You had missed the deadline and now you file this motion after speaking with me. That was the true nature of the call from Mark. He kept speaking in circles without telling me the reason why he was calling me.

You had missed the deadline and you had Mark give me a call and give me misleading information to agree to an extension. There was nothing wrong with my filing. I had met the deadline.

I had to arrange a ride, climb up those stairs, stand in line to file my paperwork. You have an entire team and access to Pacer which I do not. If you wanted an extension, you could have been straightforward and asked me for one. That is not what you did.

The nature of your call had to do with the fact that you had missed your own deadline. And Mark's phone call was quite misleading to tell me there were deficiencies with my filing. The fact is it was with you missing the deadline.

I've already dealt with ACRC's lawyers who got me to sign a severance package by misleading me about my rights. The former director of California civil rights division helped them into having me waive away my right. And now you guys give me a phone call trying to give me a bullshit reason because you missed your own deadline.

I have to go file my claim, months of unable to walk. Why should the judge allow you an extension when I wasn't allowed to file my claims electronically? Your call was meant to deceive me. This has been my experience all along with ACRC and this just adds to my story about how they do business. Your services are paid tax payer money.

I will be reaching out to the Attorney General. You are being paid with taxpayer. Your filing with a court is not a true account of what happened.

You can cancel that meeting scheduled in two weeks.

I'm not OK with this.

[Quoted text hidden]

Duffy, Maureen M. (Silicon Valley) <Maureen.Duffy@jacksonlewis.com>

Wed, Dec 3, 2025 at 4:12 PM

To: Sharon Chand <sharon.s.chand@gmail.com>, "Torres, Valynn (Silicon Valley)" <Valynn.Torres@jacksonlewis.com>

Cc: "Marsenovic, Mark (Sacramento)" <Mark.Marsenovic@jacksonlewis.com>

Hi Sharon,

Thank you for your recent note and thank you for your note and your call this morning. As you may recall, you called me this morning and asked if you needed to re-serve your Second Amended Complaint as my colleague and I were newly assigned to the matter. I informed you that we were not your attorneys, but as far as we knew, there was nothing further for you to do at this time with regards to service. I also informed you that we were in the process of filing our completed response to your Second Amended Complaint as you and I were speaking on the phone. Please note that the representations made within the Motion are accurate. Thank you for stating, or at least implying, that you would have provided us with an extension of time. Your professional courtesy is appreciated. However, as noted in the Motion, we had no choice but to make the request to the Court.

We do hope we can continue to communicate, and that you reconsider our scheduled meeting for Saturday, December 13th. There is a great deal to discuss, and we would appreciate the opportunity to do so. While we would prefer it if you would refrain from using unprofessional language in your communications with us, we do value frankness.

Best regards,

Maureen

Maureen M. Duffy (She/Her)
Attorney at Law

JL
Jackson Lewis P.C.
160 W Santa Clara St.
Suite 400
San Jose, CA 95113
Direct: (408) 513-2275 | Main: (408) 579-0404
Maureen.Duffy@jacksonlewis.com | www.jacksonlewis.com

[Quoted text hidden]

Sharon Chand <sharon.s.chand@gmail.com>
To: "Duffy, Maureen M. (Silicon Valley)" <Maureen.Duffy@jacksonlewis.com>
Cc: "Torres, Valynn (Silicon Valley)" <Valynn.Torres@jacksonlewis.com>, "Marsenovic, Mark (Sacramento)" <Mark.Marsenovic@jacksonlewis.com>

Wed, Dec 3, 2025 at 4:35 PM

You were not honest with me. Either you or Mark told me you had missed your own deadline. That is not what the call was about. And please don't take liberty with stating that I would have granted you an extension after the stunt you pulled.

This is what you attempted to do with a call made by Mark. You attempted to get me to agree to an extension by telling me there was deficiencies with my filing, and it was not in line with the judges order. This is exactly what Mark said to me.

You did not call me to tell me you had missed your own deadline and were requesting an extension. This is not what the call was about Maureen. Mark told me there was deficiencies with my filing. Mark told me he needed 15 days to fix the deficiencies with the court.

I replied that I will reach out to the judge and let them know if I had a misunderstood of the process of filing my complaint, I would fix it. You only filed this request today after I told you I was going to reach out to the judge. Nothing you filed with the court was communicated to me.

At no point did you or Mark tell me that the call was about an extension. Mark said they were deficiencies with my filing and not in line with the orders of the court. That is extremely misleading and manipulative. I told you and Mark I don't have council. I did not understand the nature of the call.

He gave me a legal code for California. I sent two follow up emails asking for clarification and none was provided by your office. You and your office are trained lawyers, I am not one. You started your first communication with me by hiding the true intent and nature of your call.

You have already filed with a court. I will do so as well. What you did was dishonest and it was manipulative. It was done with the intention to deceive me. I don't have the convenience to file electronically via pacer like you do. Then you went

Nothing of your interaction speaks of integrity or honesty.

[Quoted text hidden]

Exhibit F

Bender's Legal Service, Inc.

Thursday December 04, 2025

INVOICE

chandSS.314683

1625 The Alameda

Suite 511

San Jose, CA 95126

Telephone: 408 286-4182 , FAX: 408 298-4484 Tax ID: 45-3753575

Sharon S. Chand
 3074 Copper Rose Walk
 Sacramento CA 95833

Case #: 2:23-CV-01583-DC-SCR(PS)

Court: U.S. District Court, Eastern District of California

Title: Sharon Chand vs. Lori Lynn Rich-Babbales, et al

Documents: Plaintiff's Pleading to Deny Defendants' Notice of Motion for Extension
of Time to File Resoponding Pleading

Date	Description	Amount
12/04/25	Warm Body CCP 1011: Maureen Duffy, AT Business Jackson Lewis, P.C.	
02:45PM	160 West Santa Clara San Jose, CA 95113, by serving: Marueen Duffy, by leaving a copy of the Documents with: "John Doe" - Security Guard, Latino, Male, 38 Years Old, Black Hair, Brown Eyes, 5 Feet 8 Inches, 165 Pounds, Served By: Krystal M. Wallace.	
12/04/25	Process Service	85.00
12/04/25	Rush (within 72 hrs local or 1 week out of county)	35.00
12/04/25	Deposit On Invoice Check Number: cc, Thank You!	-120.00
	Balance Due	0.00

Pay either by invoice or by the statement sent the first of the month.

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<i>Attorney or Party without Attorney:</i> Sharon S. Chand 3074 Copper Rose Walk Sacramento, CA 95833 Telephone No: 408-931-3574		<i>For Court Use Only</i>	
		<i>Ref. No. or File No.:</i>	
<i>Attorney for:</i> Plaintiff			
<i>Insert name of Court, and Judicial District and Branch Court:</i> U.S. District Court, Eastern District of California			
<i>Plaintiff:</i> Sharon Chand			
<i>Defendant:</i> Lori Lynn Rich-Babbales, et al			
PROOF OF SERVICE	<i>Hearing Date:</i>	<i>Time:</i>	<i>Dept/Div:</i>
			<i>Case Number:</i> 2:23-CV-01583-DC-SCR(PS)

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of the Plaintiff's Pleading to Deny Defendants' Notice of Motion for Extension of Time to File Resoponding Pleading

3. a. *Party served:* Maureen Duffy
b. *Person served:* Maureen Duffy
4. *Address where the party was served:*
Jackson Lewis, P.C.
160 West Santa Clara
Suite 400
San Jose, CA 95113
5. *I served the party:*
a. **by personal service.** I personally delivered the documents listed in item 2 to the party or person authorized to receive process for the party on: Thu., Dec. 04, 2025 at: 2:45PM, to the person(s) indicated below in the manner as provided in 1011 CCP:
"John Doe" - Security Guard, Latino, Male, 38 Years Old, Black Hair, Brown Eyes, 5 Feet 8 Inches, 165 Pounds

7. Person Who Served Papers:

- Krystal M. Wallace
- Bender's Legal Service, Inc.
1625 The Alameda
Suite 511
San Jose, CA 95126
- 408 286-4182, FAX 408 298-4484

Recoverable Cost Per CCP 1033.5(a)(4)(B)

- The Fee for Service was:* \$120.00
- I am:* (3) registered California process server
 - Owner
 - Registration No.: PS1862
 - County: Santa Clara
 - Expiration Date: Tue, May. 05, 2026

8. I declare under penalty of perjury under the laws of the State of California and under the laws of the United States Of America that the foregoing is true and correct.
Date: Thu, Dec. 04, 2025